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Nanette S. Edwards
Executive Director - ORS

January 11, 2019

VIA ELECTRONIC FILING

Jocelyn Boyd, Esquire
Chief Clerk
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: **Consolidated Docket Nos.: 2017-207-E; 2017-305-E; and 2017-370-E**

Dear Mrs. Boyd:


The Office of Regulatory Staff ("ORS") has reviewed the proposed order on reconsideration that was submitted by Dominion Energy and South Carolina Electric & Gas ("Joint Applicants") on January 9, 2019. As drafted, ORS is gravely concerned that the proposed order, particularly pages 8 through 18, seeks to have the Commission ignore the clear weight of the evidence and whitewash the events that led to the largest economic debacle in South Carolina history. Notably, while the Joint Applicants did not file a petition for reconsideration in this docket, the proposed order makes numerous unsupported statements and inferences. For example, construction lawyer and SCE&G witness George Wenick is not an expert and did not conduct or provide a reliable "assessment of the assessment" as claimed in the proposed order. Another of the numerous examples in the proposed order is the Joint Applicants request that the Commission adopt the unsupported claim that \$500 million in additional, undisclosed costs was not material in 2015.

If the Commission desires proposed orders from any party, ORS asks that such be requested by the Commission after its issuing a ruling or directive on the motions for reconsideration.

Letter-Jocelyn Boyd
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To adopt verbatim the Joint Applicants' proposed order would be a major disservice to this Commission, ratepayers and the evidence presented in the consolidated docket.

Sincerely,

A handwritten signature in cursive script that reads "Nanette S. Edwards".

Nanette S. Edwards

cc: Joseph Melchers, Esquire (via Email)
David Butler, Esquire (via Email)
All Parties of Record in Docket No: 2017-207-E
All Parties of Record in Docket No: 2017-305-E
All Parties of Record in Docket No: 2017-370-E